

Sacramento Municipal Utility District Station H Substation Project

Final Environmental Impact Report • June 2021
State Clearinghouse #2020110057

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Sacramento Municipal Utility District

Station H Substation Project

Final Environmental Impact Report

State Clearinghouse #2020110057

June 2021

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Acronyms and Abbreviations

AB	Assembly Bill
ADL	aerially deposited lead
Basin Plan	Fifth Edition of the Water Quality Control Plan
BMP	best management practices
CCR	California Code of Regulations
Central Valley Water Board	Central Valley Regional Water Quality Control Board
City	City of Sacramento's
CSS	combined sewer system
Draft EIR	draft environmental impact report
DTSC	Department of Toxic Substances Control
Final EIR	final environmental impact report
IS	Initial Study
MMRP	Mitigation Monitoring and Reporting Program
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
project	Station H Substation Project
SMUD	Sacramento Municipal Utility District
SQIP	Stormwater Quality Improvement Plan
the Board	Board of Directors
USACE	United States Army Corps of Engineers
WDR	Waste Discharge Requirement

1 Introduction

On March 17, 2021, the Sacramento Municipal Utility District (SMUD) released for public review the draft environmental impact report (Draft EIR) for the proposed Station H Substation Project (project). The EIR describes the existing conditions of the project site (the existing Station A Substation), analyzes the potential environmental impacts of the project, and identifies mitigation measures where necessary and available to avoid or reduce the magnitude of potentially significant impacts of the project. As part of the project, SMUD would decommission and remove outdated Station A equipment that is currently present at the project site and replace the existing equipment within the outdoor area between the historic Station A building and the Mercy Housing Community to the east with new outdoor substation equipment.

1.1 Public Review and Response to Comments

In accordance with Sections 15087 and 15105 of the State CEQA Guidelines, the Draft EIR was circulated for public review and comment to lead and responsible agencies, as well as members of the public, for 45 days (March 17, 2021 through April 30, 2021). SMUD also held a public meeting on April 8, 2021 to receive comments on the Draft EIR. Written comment letters received on the Draft EIR are provided in their entirety in Chapter 2, “Comments and Responses to Comments.”

Responses to each of the comments received are provided in this document as part of the final environmental impact report (Final EIR). None of the comments require changes to the text of the Draft EIR. Therefore, there are no changes that constitute “significant new information,” which would require recirculation of the Draft EIR. Significant new information is defined in Section 15088.5(a) of the State CEQA Guidelines as follows:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
- (4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

None of these circumstances have arisen from comments on the Draft EIR; therefore, recirculation is not required.

The Draft EIR, Final EIR, and associated appendices are available for review online at: <https://www.smud.org/stationh>

and at the following locations:

Sacramento Municipal Utility District
Customer Service Center
6301 S Street
Sacramento, CA 95817

Sacramento Municipal Utility District
East Campus Operations Center
4401 Bradshaw Road
Sacramento, CA 95827

As required by State CEQA Guidelines Section 15088(b), SMUD has provided a printed or electronic copy (through the SMUD's website; see prior discussion) to each public agency that submitted written comments on the Draft EIR with written responses to that public agency's comments at least 10 days prior to consideration of the Final EIR for certification.

1.2 Organization of the Responses to Comments

Chapter 2 of the Final EIR consists of the written comments received on the Draft EIR, and presents responses to environmental issues raised in the comments (as required by State CEQA Guidelines Section 15132). The focus of the responses to comments is on the disposition of significant environmental issues that are raised in the comments, as required by Section 15088(c) of the State CEQA Guidelines.

Each comment letter has been reproduced with individual comments bracketed and numbered. Responses to the comments follow each letter. For example, the response to the second comment of the first letter would be indicated as Response to Comment 1-2.

1.3 Comments that Require Responses

Section 15088(c) of the State CEQA Guidelines specifies that the focus of the responses to comments shall be on the disposition of significant environmental issues. Responses are not required on comments regarding the merits of the project or on issues not related to the project's environmental impacts. Comments on the merits of the proposed project or other comments that do not raise environmental issues will be reviewed by SMUD's Board of Directors (the Board) before an action is taken on the project. The responses address environmental issues and indicate where issues raised are not environmental or address the merits of the projects. In the latter instance, no further response is provided.

1.4 Project Decision Process

This document and the Draft EIR together constitute the Final EIR, which will be considered by the Board before a decision on whether to approve the project. If the Board decides to approve the project, it must first certify that the Final EIR was completed in compliance with CEQA's requirements, was reviewed and considered by the Board, and reflects the Board's independent judgment and analysis, as required by State CEQA

Guidelines Section 15090. The Board would then be required to adopt findings of fact on the disposition of each significant environmental impact, as required by State CEQA Guidelines Section 15091. If significant and unavoidable impacts (those that cannot be mitigated to a less-than-significant level) would result from the project and the Board chooses to approve the project, the Board would need to adopt a statement of overriding considerations, pursuant to State CEQA Guidelines Section 15093, explaining the overriding factors that the Board deems allow the project to move forward. In the case of the proposed Station H Substation Project, there would be significant and unavoidable impacts related to Tribal cultural resources. A Mitigation Monitoring and Reporting Program, which is required by CEQA Guidelines Section 15091(d), has been included as part of Chapter 3 of this Final EIR.

1.5 Project Updates

As discussed in Section 1.1, “Public Review and Response to Comments,” above, CEQA requires recirculation of an EIR when the lead agency adds “significant new information” to an EIR, regarding changes to the project description or the environmental setting, after public notice is given of the availability of a draft EIR for public review under State CEQA Guidelines, California Code of Regulations (CCR) Section 15087, but before EIR certification (State CEQA Guidelines CCR Section 15088.5[a]). Recirculation is not required unless the EIR is changed in a way that would deprive the public of the opportunity to comment on significant new information, including a new significant impact in which no feasible mitigation is available to fully mitigate the impact (thus resulting in a significant and unavoidable impact), a substantial increase in the severity of a disclosed environmental impact, or development of a new feasible alternative or mitigation measures that would clearly lessen environmental impacts but that the project proponent declines to adopt (State CEQA Guidelines CCR Section 15088.5[a]). Recirculation is not required when the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR (State CEQA Guidelines CCR Section 15088.5[b]).

Since release of the Draft EIR, SMUD has continued to coordinate with the Native American Tribes under AB 52. At this time, SMUD and the Tribes have agreed that AB 52 consultation has been completed, though SMUD will continue to coordinate with the Tribes regarding implementation of the mitigation measures as discussed below.

1.5.1 Tribal Consultation Update

Assembly Bill (AB) 52 requires that lead agencies undertaking CEQA consult with California Native American Tribes upon the Tribes’ written request and evaluate in the EIR the potential for projects to affect Tribal cultural resources. Section 3.1, “Tribal Cultural Resources,” of the Draft EIR describes the consultation that has occurred between the tribes and SMUD pursuant to AB 52. In particular, the Draft EIR (refer to pages 3.1-8 and 3.1-9) summarizes the consultation process that occurred prior to release of the Draft EIR for public review. During the Draft EIR public review period, SMUD continued to coordinate with the Tribes, including submitting a draft of the

treatment plan required by Mitigation Measure 3.1-1a (found on page 3.1-13 of the Draft EIR) for Tribes to review. Additionally, SMUD and the Tribes have continued discussions regarding the implementation of Mitigation Measures 3.1-1b and 3.1-1c (found on pages 3.1-13 and 3.1-14 of the Draft EIR).

Based on these further communications, Tribal consultation under AB 52 has been completed. This project update does not constitute significant new information that would require recirculation of the document because no new significant or substantially more severe environmental impacts that cannot be mitigated to a less-than-significant level through mitigation already included in the Draft EIR have been identified.

2 Comments and Responses to Comments

This chapter contains the comment letters received during the public review period for the Draft EIR, which concluded on April 30, 2021. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

2.1 Commenters on the Draft EIR

Table 2-1 below indicates the alpha-numerical designation for the comment letters received, the author of the comment letter, and the date of the comment letter. Comment letters have been numbered in the order they were received by SMUD.

Table 2-1 List of Commenters

Letter Number	Commenter	Date
State		
S1	California Department of Toxic Substances Control Gavin McCreary, Project Manager, Site Evaluation and Remediation Unit	March 19, 2021
S2	Central Valley Regional Water Quality Control Board Angela Nguyen-Tan, Environmental Scientist	April 23, 2021
Local		
L1	Sacramento Fire Department King Tunson, Program Specialist, Fire Planning Entitlements/Administration	March 18, 2021
L2	Sacramento Metropolitan Air Quality Management District Rachel DuBose, Air Quality Planner/Analyst	April 29, 2021

2.2 Comments and Responses on the Draft EIR

The written comments received on the Draft EIR and the responses to those comments are provided in this section of the Final EIR. The comment letters received are reproduced in their entirety and followed by the response(s) to the letter. Each comment within the letters is indicated by a line bracket and an identifying number in the margin of the comment letter. The responses that follow the letter are numbered, corresponding to the comment number in the bracketed letter.

All comments and provided herein are included within the record for consideration by the SMUD Board of Directors (the Board) as part of the Station H Substation Project.

State



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

Letter
S1

March 19, 2021

Mr. Rob Ferrera
Sacramento Municipal Utility District
6201 S Street
Sacramento, CA 95817
Rob.Ferrera@smud.org

DRAFT ENVIRONMENTAL IMPACT REPORT FOR STATION H SUBSTATION
PROJECT – DATED MARCH 2021 (STATE CLEARINGHOUSE NUMBER:
2020110057)

Mr. Ferrera:

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (EIR) for Station H Substation Project (Project). The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, work in close proximity to mining or suspected mining or former mining activities, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

S1-1

DTSC recommends that the following issues be evaluated in the EIR Hazards and Hazardous Materials section:

1. The EIR should acknowledge the potential for historic or future activities on or near the project site to result in the release of hazardous wastes/substances on the project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.
2. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerially deposited lead (ADL) being deposited in

S1-2

S1-3

Mr. Rob Ferrera
March 19, 2021
Page 2

<p>and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil DTSC, recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the EIR.</p>	 	<p>S1-3 cont.</p>
<p>3. If any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed in the EIR. DTSC recommends that any project sites with current and/or former mining operations onsite or in the project site area should be evaluated for mine waste according to DTSC's 1998 Abandoned Mine Land Mines Preliminary Assessment Handbook (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/aml_handbook.pdf).</p>	 	<p>S1-4</p>
<p>4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 <i>Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers</i> (https://dtsc.ca.gov/wpcontent/uploads/sites/31/2018/09/Guidance_Lead_Contamination_050118.pdf).</p>	 	<p>S1-5</p>
<p>5. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to DTSC's 2001 <i>Information Advisory Clean Imported Fill Material</i> (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP_FS_Cleanfill-Schools.pdf).</p>	 	<p>S1-6</p>
<p>6. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 <i>Interim Guidance for Sampling Agricultural Properties (Third Revision)</i> (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Ag-Guidance-Rev-3-August-7-2008-2.pdf).</p>	 	<p>S1-7</p>
<p>DTSC appreciates the opportunity to comment on the EIR. Should you need any assistance with an environmental investigation, please submit a request for Lead Agency Oversight Application, which can be found at: https://dtsc.ca.gov/wp-</p>	 	<p>S1-8</p>

Mr. Rob Ferrera
March 19, 2021
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content/uploads/sites/31/2018/09/VCP_App-1460.doc. Additional information regarding
voluntary agreements with DTSC can be found at: <https://dtsc.ca.gov/brownfields/>.

If you have any questions, please contact me at (916) 255-3710 or via email at
Gavin.McCreary@dtsc.ca.gov.

S1-8
cont.

Sincerely,



Gavin McCreary
Project Manager
Site Evaluation and Remediation Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

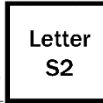
cc: (via email)

Governor's Office of Planning and Research
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Mr. Dave Kereazis
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

<i>Letter</i> <i>S1</i> <i>Response</i>	<i>California Department of Toxic Substances Control</i> <i>Gavin McCreary, Project Manager</i> <i>March 19, 2021</i>
S1-1	<p>The comment introduces the Department of Toxic Substances Control's (DTSC's) jurisdiction over certain activities that may be part of the project. The comment is introductory in nature and does not address the content, analysis, or conclusions in the Draft EIR. No further response is required.</p>
S1-2	<p>The comment states that the EIR should acknowledge the potential for historic or future activities on or near the project site to result in the release of hazardous wastes/substances on the project site.</p> <p>As discussed on pages 3-9 and 3-10 of the Draft EIR, small quantities of hazardous materials such as fuels and lubricants would be used during project construction and the project would be required to comply with existing laws and regulations regarding the transportation, use, and disposal of hazardous materials. Also, SMUD would conduct testing of soils to be removed from the project site and ongoing groundwater testing (performed by others) would continue to take place in the South Plume Groundwater Study Area. Finally, the project is not located on an active site included on a list of hazardous materials sites. For these reasons, the project would not result in significant impacts related to hazards and hazardous materials, and this issue is not discussed further in the Draft EIR.</p>
S1-3	<p>The comment states that soils could be contaminated with aerially deposited lead (ADL), and DTSC recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project. As discussed in Response to Comment S1-2, SMUD would conduct testing of soils prior to their removal from the project site. Should any contamination be identified during on-site testing, SMUD would follow all applicable regulations regarding transportation and disposal of the contaminated soil.</p>
S1-4	<p>The comment states that proper investigation for mine waste should be discussed if any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities. As discussed on page 65 of the Initial Study (IS) prepared for the project and included as Appendix B of the Draft EIR, the soils underneath the project site are classified as MRZ-1, which indicates no significant mineral deposits are located beneath ground surface at the project site. Also, based on the known history of the site as an electrical substation and previous Native American and Chinese use of the site, it is not likely that the project site has been used for mining activities.</p>

- S1-5 The comment states that surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. The comment further states that removal, demolition, and disposal of any of these chemicals should be conducted in compliance with California environmental regulations and policies.
- As discussed in Chapter 3, “Project Description,” of the Draft EIR, the project would include the removal of existing equipment but would not include demolition of on-site structures that may contain the materials listed by the commenter. Also, SMUD will evaluate soil samples during project construction to determine whether there is any soil contamination. As discussed on pages 56 and 57 of the IS (Appendix B of the Draft EIR), should any hazardous materials or conditions be discovered during project construction activities, the project would comply with existing laws and regulations related to the use, disposal, and transport of hazardous materials.
- S1-6 The comment states that sampling should be conducted on imported soil to ensure that it is free from contamination. As stated on page 2-7 of the Draft EIR, SMUD anticipates excavation and removal of existing soil and import either backfill soil or virgin aggregate base to re-establish grade within the site, though removal and import volumes are not yet known. SMUD will adhere to all applicable regulatory guidance regarding imported soil, including DTSC’s 2001 *Information Advisory Clean Imported Fill Material* (DTSC 2001).
- S1-7 The comment states that proper investigation for organochlorinated pesticides should be discussed if any sites included as part of the proposed project have been used for agricultural, weed abatement, or related activities. As discussed in Chapter 3, “Project Description,” of the Draft EIR, the project site is in a highly developed area of downtown Sacramento and has been the site of outdoor electrical facilities for approximately 70 years. Thus, it is unlikely that the project site was ever used for agricultural activities that could have involved modern organochlorinated pesticides, and no further investigation is needed.
- S1-8 The comment provides contact information should SMUD require additional information or assistance from DTSC. As the comment does not address the content, analysis, or conclusions in the Draft EIR, no further response is required.



Central Valley Regional Water Quality Control Board

23 April 2021

Rob Ferrera
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**COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL
IMPACT REPORT, STATION H SUBSTATION PROJECT, SCH#2020110057,
SACRAMENTO COUNTY**

Pursuant to the State Clearinghouse's 17 March 2021 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the Station H Substation Project, located in Sacramento County.

S2-1

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

S2-2

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

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Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

 S2-2
 cont.

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

S2-3

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

S2-4

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

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Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

S2-5

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

S2-6

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

S2-7

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic

S2-8

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

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General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

S2-8
cont.**Waste Discharge Requirements – Discharges to Waters of the State**

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

S2-9

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:
https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

S2-10

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

Station H Substation Project
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For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

S2-10
cont.**Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

S2-11

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

S2-12

If you have questions regarding these comments, please contact me at (916) 464-0335 or Angela.Nguyen-Tan@waterboards.ca.gov.

S2-13



Angela Nguyen-Tan
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,
Sacramento

<i>Letter S2 Response</i>	<i>Central Valley Regional Water Quality Control Board Angela Nguyen-Tan, Environmental Scientist April 23, 2021</i>
S2-1	<p>The comment presents introductory information regarding the Central Valley Regional Water Quality Control Board (Central Valley Water Board) and its jurisdiction over certain activities that may be part of the project. The comment is introductory in nature and does not address the content, analysis, or conclusions in the Draft EIR; no further response is required.</p>
S2-2	<p>The comment provides an overview of the regulatory responsibility of the Central Valley Water Board, including its requirement to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act and provides regulatory background. The comment does not address the content, analysis, or conclusions in the Draft EIR; no further response is required.</p>
S2-3	<p>The comment states that all wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The comment also states that environmental review document should evaluate potential impacts to both surface and groundwater quality. As stated on page 59 of the IS (Appendix B of the Draft EIR), drainage from the project flows into the City of Sacramento's (City's) combined sewer system (CSS) where it flows to a wastewater treatment plant and is eventually discharged to the Sacramento River. As such, the applicable water quality standards are listed in the Fifth Edition of the Water Quality Control Plan (Basin Plan) for the Sacramento River and San Joaquin River Basins.</p> <p>The City's Grading, Erosion, and Sediment Control Ordinance (Title 15, City of Sacramento Municipal Code, Chapter 15.88) includes specific standards for project construction related to erosion control. Although the substation component of this project is exempt from this ordinance pursuant to Government Code § 53091(d), SMUD and its contractors will comply with the substance of these standards both during and following the completion of project construction.</p>
S2-4	<p>The comment states that dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. As stated on page 59 of the IS (Appendix B of the Draft</p>

EIR), because the project is not expected to disturb more than one acre of land, coverage would not be needed under the Construction General Permit. However, consistent with City requirements, the project would be required to implement best management practices (BMPs) intended to reduce pollutants in stormwater and other non-point source runoff. The City's Grading, Erosion, and Sediment Control Ordinance (Title 15, City of Sacramento Municipal Code, Chapter 15.88) includes specific standards for project construction related to erosion control. Although the substation component of this project is exempt from this ordinance pursuant to Government Code § 53091(d), SMUD and its contractors will comply with the substance of these standards both during and following the completion of project construction.

- S2-5 The comment states that Phase I and II Municipal Separate Storm Sewer System (MS4) permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using BMPs. As noted on page 59 of the IS (Appendix B of the Draft EIR), stormwater at the project site drains to the City's CSS where it is then conveyed to one of two facilities for primary treatment before discharge to the Sacramento River. CSS flows and discharges are currently regulated by the provisions of Waste Discharge Requirement Order No. R5-2015-0045 (NPDES No. CA0079111).
- S2-6 The comment states that stormwater discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. The project would include the rebuilding of the site for continued use as an electrical substation, which would not discharge stormwater associated with industrial activity. The City's Grading, Erosion, and Sediment Control Ordinance (Title 15, City of Sacramento Municipal Code, Chapter 15.88) includes specific standards for project construction related to erosion control. Although the substation component of this project is exempt from this ordinance pursuant to Government Code § 53091(d), SMUD and its contractors will comply with the substance of these standards both during and following the completion of project construction.
- S2-7 The comment states that a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE) if the project would involve the discharge of dredged or fill material in navigable waters or wetlands. As discussed on page 40 of the IS (Appendix B of the Draft EIR), the project site does not contain any wetland, stream, or other aquatic habitat that could be considered jurisdictional waters of the United States or state and all project activities would take place within previously developed areas.

- S2-8 The comment states that a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities if a USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States. As discussed in Response to Comment S2-7, the project site does not contain any wetland, stream, or other aquatic habitat that could be considered jurisdictional waters of the United States or state, and no permits from USACE or other federal agency(ies) related to disturbance of waters of the United States would be required.
- S2-9 The comment states that if USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. As discussed on page 40 of the IS (Appendix B of the Draft EIR), the project site does not contain any wetland, stream, or other aquatic habitat that could be considered jurisdictional waters of the United States or state and all project activities would take place within previously developed areas.
- S2-10 The comment states that if the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. As discussed on page 61 of the IS (Appendix B of the Draft EIR), should dewatering be required during project construction, water would be collected and treated prior to discharge, in accordance with City requirements.
- S2-11 The comment states that if the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Please see Response to Comment S2-10.
- S2-12 The comment states that if the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under an NPDES permit. As discussed on page 59 of the IS (Appendix B of the Draft EIR), drainage from the project site flows into the City of Sacramento’s CSS. Therefore, the project would not require coverage under an NPDES permit.

S2-13 The comment provides contact information should SMUD have any questions about the Central Valley Water Board's comments. As the comment does not address the content, analysis, or conclusions in the Draft EIR, no further response is required.

Local

Letter L1

From: King Tunson <ktunson@sfd.cityofsacramento.org>
Sent: Friday, March 26, 2021 12:02 PM
To: Rob Ferrera <Rob.Ferrera@smud.org>; Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Sarai Ochoa <sochoa@cityofsacramento.org>
Subject: [EXTERNAL] RE: SMUD Station H Draft EIR

CAUTION: This email originated from outside of SMUD. Do not click links or open attachments unless you recognize the sender and know the content is safe.
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Hi Rob,

Thanks for providing the document. I've reviewed and don't have any comments.

King Tunson
Program Specialist
Fire Planning Entitlements/Administration
Sacramento Fire Department
5770 Freeport Blvd, Ste 200
Sacramento, CA 95822
Office (916) 808-1358
Fax (916) 808-1677
ktunson@sfd.cityofsacramento.org

L1-1

*Letter
L1
Response*

*Sacramento Fire Department
King Tunson, Program Specialist, Fire Planning
Entitlements/Administration
March 18, 2021*

L1-1

The comment states that the Sacramento Fire Department does not have any comments on the Draft EIR. As the comment does not address the content, analysis, or conclusions in the Draft EIR, no further response is required.

Letter L2

CAUTION: This email originated from outside of SMUD. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Rob,
The Sac Metro Air District has reviewed the Station H DEIR and has no comments.
Best regards,
Rachel DuBose

| L2-1

Rachel DuBose
Air Quality Planner/Analyst
Desk: (916) 874-4876
www.AirQuality.org
 @AQMD

*Letter
L2
Response*

*Sacramento Metropolitan Air Quality Management District
Rachel DuBose, Air Quality Planner/Analyst
April 29, 2021*

L2-1

This comment states that the Sacramento Metropolitan Air Quality Management District does not have any comments on the Draft EIR. As the comment does not address the content, analysis, or conclusions in the Draft EIR, no further response is required.



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3 Mitigation Monitoring and Reporting Program

This mitigation monitoring and reporting program (MMRP) summarizes the mitigation measures, implementation schedule, and responsible parties for monitoring the mitigation measures required of the proposed Station H Substation Project, as set forth in the EIR prepared for the project.

Section 21081.6 of the California Public Resources Code and Section 15091(d) and Section 15097 of the State CEQA Guidelines require public agencies “to adopt a reporting or monitoring program for changes to the project which it has adopted or made conditions of project approval to mitigate or avoid significant effects on the environment.” An MMRP is required for the project because the EIR for the project identified potentially significant adverse impacts related to construction and operation of the project, and mitigation measures have been identified to reduce most of those impacts to a less-than-significant-level.

This MMRP will be adopted by SMUD if it approves the project and will be kept on file at SMUD’s Customer Service Center at 6301 S Street, Sacramento, CA 95817; and at SMUD’s East Campus Operations Center at 4401 Bradshaw Road, Sacramento, CA 95827. SMUD will use this MMRP to ensure that identified mitigation measures, adopted as a condition of project approval, are implemented appropriately.

3.1 Mitigation Implementation and Monitoring

SMUD will be responsible for monitoring the implementation of mitigation measures designed to minimize impacts associated with the project. While SMUD has ultimate responsibility for ensuring implementation, others may be assigned the responsibility of actually implementing the mitigation. SMUD will retain the primary responsibility for ensuring that the project meets the requirements of this MMRP and other permit conditions imposed by participating regulatory agencies.

SMUD will designate specific personnel who will be responsible for monitoring implementation of the mitigation that will occur during project construction. The designated personnel will be responsible for submitting documentation and reports to SMUD on a schedule consistent with the mitigation measure and in a manner necessary for demonstrating compliance with mitigation requirements. SMUD will ensure that the designated personnel have authority to require implementation of mitigation requirements and will be capable of terminating project construction activities found to be inconsistent with mitigation objectives or project approval conditions.

SMUD and its appointed contractor will also be responsible for ensuring that its construction personnel understand their responsibilities for adhering to the performance requirements of the mitigation plan and other contractual requirements related to the implementation of mitigation as part of project construction. In addition to the prescribed mitigation measures, Table 3-1 lists each identified environmental resource being affected (in the same order and using the same numbering system as in the EIR), the associated CEQA checklist question (used as the thresholds of significance in the EIR),

the corresponding monitoring and reporting requirement, the party responsible for ensuring implementation of the mitigation measure and monitoring effort, and the project component to which the mitigation measure applies.

If an issue addressed in the EIR does not result in mitigation, it is not included in the table.

3.2 Mitigation Enforcement

SMUD will be responsible for enforcing mitigation measures. If alternative measures are identified that would be equally effective in mitigating the identified impacts, implementation of these alternative measures will not occur until agreed upon by SMUD.

3.3 Reporting

SMUD shall, or may require the developer to, prepare a monitoring report upon completion of the project describing the compliance of the activity with the required mitigation measures. Information regarding inspections and other requirements shall be compiled and explained in the report. The report shall be designed to simply and clearly identify whether mitigation measures have been adequately implemented. At a minimum, each report shall identify the mitigation measures or conditions to be monitored for implementation, whether compliance with the mitigation measures or conditions has occurred, the procedures used to assess compliance, and whether further action is required. The report shall be presented to SMUD's Board of Directors.

3.4 Regulatory Considerations

In addition to the mitigation measures set forth in this MMRP, SMUD complies with all applicable regulations and statutes, including but not limited to the following:

- The City of Sacramento's noise restrictions (Title 8, City of Sacramento Municipal Code, Chapter 8.68), which restricts the days and hours of construction noise, will be followed.
- The City's Grading, Erosion, and Sediment Control Ordinance (Title 15, City of Sacramento Municipal Code, Chapter 15.88) includes specific standards for project construction related to erosion control. Although the substation component of this project is exempt from this ordinance pursuant to Government Code § 53091(d), SMUD and its contractors will comply with the substance of these standards both during and following the completion of project construction.
- Should groundwater be encountered during project construction, testing would occur in accordance with DTSC and Regional Water Quality Control Board (RWQCB) requirements prior to dewatering activities. This may include seeking coverage under RWQCB's General Order for Dewatering (R5-2013-0074). If dewatering activities are needed, they would include the potential use of Baker tanks and/or filtration bags, if needed, to treat water prior to discharge into the City's stormdrain system and/or sewer system.

It should be noted that this discussion of regulatory requirements is not intended to be all-inclusive; site specific conditions and activities may require compliance with other regulations or statutes.

3.5 Mitigation Monitoring and Reporting Program Table

The categories identified in the attached MMRP table are described below.

Checklist Section – This column identifies which CEQA issue area the mitigation measure is attributed to in the EIR.

Impact or Environmental Criteria – This column provides the verbatim text of the impact statement included in the EIR or the CEQA Appendix G checklist questions for issues not further evaluated in the EIR.

Mitigation Measure – This column provides the verbatim text of the adopted mitigation measure.

Implementation Duration – This column identifies when the mitigation measure shall be implemented (e.g., prior to construction, during construction, prior to occupancy, etc.).

Monitoring Duration – This column identifies the period within which monitoring shall be conducted.

Responsibility – This column identifies the party(ies) responsible for implementation and/or enforcing compliance with the requirements of the mitigation measure.

Applicable Project Component – This column identifies with what component or under what conditions the mitigation measure should be implemented (e.g., during high wind conditions, construction within wetlands, etc.).

Checklist Section	Impact or Environmental Criteria	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
3.18 Tribal Cultural Resources	Impact 3.1-1: Cause a substantial adverse change in the significance of a Tribal cultural resource, including human remains.	<p>Mitigation Measure 3.1-1a: Prepare and implement a treatment plan.</p> <p>Before ground disturbance associated with the project, SMUD shall, in cooperation with UAIC, Wilton Rancheria, Lone Band of Miwok Indians, and Shingle Springs Band of Miwok Indians, finalize a treatment plan specific to the site. The treatment plan shall include, but is not limited to:</p> <ul style="list-style-type: none"> • testing, • excavation strategy, • research design, • Tribal monitoring, • resource significance assessment methods, • discovery, preservation, and evaluation methods, • a burial treatment agreement, • reporting requirements, and • health and safety procedures. <p>The testing portion of the treatment plan shall be implemented once Station A has been safely decommissioned; if resources are discovered during testing, the treatment plan would continue to be implemented throughout ground disturbing activities on the project site.</p>	Prior to ground disturbance	During construction activities	SMUD	SMUD
3.5 Cultural Resources	Impact 3.2-3: Change the significance of a prehistoric archaeological resource.	<p>Mitigation Measure 3.1-1b: Prepare and implement worker cultural resources awareness and respect training program.</p> <p>A cultural resources respect training program will be provided to all construction personnel active on the project site prior to implementation of earth moving activities. A representative or representatives from culturally affiliated Native American Tribe(s) will be</p>	Prior to and during construction activities (ground disturbance)	During construction activities (ground disturbance)	SMUD	SMUD

Checklist Section	Impact or Environmental Criteria	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
		<p>invited to participate in the development and delivery of the cultural resources awareness and respect training program in coordination with a qualified archaeologist meeting the United States Secretary of Interior guidelines for professional archaeologists. The program will include relevant information regarding sensitive Tribal cultural resources, including protocols for resource avoidance, applicable laws regulations, and the consequences of violating them. The program will also underscore the requirement for confidentiality and culturally-appropriate treatment of any find of significance to Native Americans and protocols, consistent, to the extent feasible, with Native American Tribal values.</p>				
		<p>Mitigation Measure 3.1-1c: Memorialize the Tribal cultural values of the project area through public education and awareness.</p> <p>To acknowledge the importance of the project area, particularly the area surrounding <i>Wanoho Pakan</i>, to California Native American Tribes, SMUD shall implement the following additional measures, regardless of whether Tribal cultural deposits related to P-34-2359 are encountered during project implementation:</p> <ol style="list-style-type: none"> 1. In coordination with UAIC, Wilton Rancheria, Lone Band of Miwok Indians, and Shingle Springs Band of Miwok Indians, SMUD shall develop a program with the American River College Native American Resource Center to benefit Native American students by enhancing areas of need or potential and shall support the program with a financial contribution. The contribution shall begin in 2021 and span a 3-year period. The program and contribution will 	Prior to operation	Prior to operation	SMUD	SMUD

Checklist Section	Impact or Environmental Criteria	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
		<p>be developed with the American River College Native American Resource Center.</p> <p>2. In coordination with UAIC, Wilton Rancheria, Lone Band of Miwok Indians, and Shingle Springs Band of Miwok Indians, SMUD shall commission a piece of art or other appropriate monumentation to represent the Tribal cultural values of the project area. The art piece could be in the form of a mural, sculpture, informative plaque, or other representation agreed to by the Tribes.</p>				
3.5 Cultural Resources	Impact 3.2-1: Change in the significance of a historical resource.	<p>Mitigation Measure 3.2-1b: Comply with the Secretary of the Interior’s Standards.</p> <ul style="list-style-type: none"> For all interior repairs to the Station A building that do not alter the external visual appearance of the building, review by an architectural historian is not required. For minor exterior repairs to the Station A building that do not alter the visual appearance of the building—such as tuck pointing—if the repairs are conducted in compliance with the Secretary’s Standards and consistent with the “Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings” (Weeks and Grimmer 1995), then review by an architectural historian is not required. For larger exterior repairs to the Station A building—such as external sheer walls—repairs shall be conducted in compliance with the Secretary’s Standards and consistent with the “Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines 	During construction activities	During construction activities	Contractor	SMUD

Checklist Section	Impact or Environmental Criteria	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
		for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings” (Weeks and Grimmer 1995), and an architectural historian shall be retained to confirm that the repairs do not result in a change to the design of the Station A building such that the building would no longer qualify as a historical resource.				
3.5 Cultural Resources	Impact 3.2-2: Change the significance of a historic-period archaeological resource.	<p>Mitigation Measure 3.2-2: Halt ground-disturbing activity upon discovery of historic-period archaeological features.</p> <p>In the event that a historic-period archaeological site (such as concentrated deposits of bottles or bricks with makers marks, amethyst glass, or other historic refuse) is uncovered during grading or other construction activities, all ground-disturbing activity within 100 feet of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. SMUD will be notified of the potential find and a qualified archeologist shall be retained to investigate its significance. Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable regulatory criteria. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either a historical resource or a unique archaeological resource), the archaeologist shall work with SMUD to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary.</p>	During construction activities (ground disturbance)	During construction activities (ground disturbance)	Contractor	SMUD

Checklist Section	Impact or Environmental Criteria	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
		If artifacts are recovered from significant historic-period archaeological resources, they shall be housed at a qualified curation facility. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, analyzes and interprets the results.				
3.3 Air Quality	Conflict with or obstruct implementation of the applicable air quality plan? Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<p>Mitigation Measure 3.3-1: Implement SMAQMD Basic Construction Emission Control Practices.</p> <p>During construction, the contractor shall comply with and implement SMAQMD’s Basic Construction Emission Control Practices, which includes SMAQMD-recommended BMPs and BACT, for controlling fugitive dust emissions. Measures to be implemented during construction include the following:</p> <ul style="list-style-type: none"> • Water all exposed surfaces at least two times daily. Exposed surfaces include, but are not limited to, soil piles, graded areas, unpaved parking areas, staging areas, and access roads. • Cover or maintain at least two (2) feet of freeboard space on haul trucks transporting soil, sand, or other loose material on the site. Cover any haul trucks that will be traveling along freeways or major roadways. • Use wet power vacuum street sweepers to remove any visible track-out mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited. 	During construction activities	During construction activities	Contractor	SMUD

Checklist Section	Impact or Environmental Criteria	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
		<ul style="list-style-type: none"> Limit vehicle speed on unpaved roads to 15 miles per hour. All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used. Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes (required by California Code of Regulations Title 13, Sections 2449[d][3] and 2485). Provide clear signage that posts this requirement for workers at the entrances to the site. Maintain all construction equipment in proper working condition according to manufacturer's specifications. Equipment will be checked by a certified mechanic and determined to be running in proper condition before it is operated. 				
3.4 Biological Resources	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California	<p>Mitigation Measure 3.4-1: Avoid disturbance of nesting birds</p> <p>If construction will occur during the nesting season (between February 1 and August 31), a SMUD project biologist/biological monitor will conduct pre-construction nesting bird surveys to determine if birds are nesting in the work area or within 0.25 mile for Swainson's hawk and 500 feet for all other nesting birds of the project site.</p> <p>The pre-construction nesting bird surveys will identify on-site bird species and any nest-building behavior. If no nesting Swainson's hawks are found on or within 0.25 mile or if no nesting birds are found on or within 500 feet of the project site during the pre-</p>	Prior to construction activities	Prior to construction activities	Qualified biologist	SMUD

Checklist Section	Impact or Environmental Criteria	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
	Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	<p>construction clearance surveys, construction activities may proceed as scheduled.</p> <p>If pre-nesting behavior is observed, but an active nest of common nesting bird has not yet been established (e.g., courtship displays, but no eggs in a constructed nest), a nesting bird deterrence and removal program will be implemented. Such deterrence methods include removal of previous year's nesting materials and removal of partially completed nests in progress. Once a nest is situated and identified with eggs or young, it is considered to be "active" and the nest cannot be removed until the young have fledged.</p> <p>If active Swainson's hawk nests are found within the nest survey area, the construction contractor shall avoid impacts on such nests by establishing a no-disturbance buffer around the nest. Monitoring of the nest by a qualified biologist during construction activities shall be required if the activity has the potential to adversely affect the nest. Based on guidance for determining a project's potential for impacting Swainson's hawks (Swainson's hawk Technical Advisory Committee 2000), projects in urban areas have a low risk of adversely affecting nests greater than 600 feet from project activities. Therefore, 600 feet is anticipated to be the adequate buffer size for protecting nesting Swainson's hawks from disturbances associated with the proposed project. However, the qualified biologist shall consult with the California Department of Fish and Wildlife to confirm the adequacy of the no-disturbance buffer and/or if the buffer is reduced based on the biologist professional judgement.</p>				

Checklist Section	Impact or Environmental Criteria	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
		<p>If an active nest of common bird species is found in or within 500 feet of the project site during construction, a “No Construction” buffer zone will be established around the active nest (usually a minimum radius of 50 feet for passerine birds and 500 feet for raptors) to minimize the potential for disturbance of the nesting activity. The project biologist/biological monitor will determine and flag the appropriate buffer size required, based on the species, specific situation, tolerances of the species, and the nest location. Project activities will resume in the buffer area when the project biologist/biological monitor has determined that the nest(s) is (are) no longer active or the biologist has determined that with implementation of an appropriate buffer, work activities would not disturb the bird’s nesting behavior.</p> <p>If special-status bird species are found nesting on or within 500 feet of the project site, the project biologist/biological monitor shall notify SMUD’s project manager to notify CDFW or USFWS, as appropriate, within 24 hours of first nesting observation.</p>				
3.13 Noise and Vibration	Generation of excessive groundborne vibration or groundborne noise levels? ¹	<p>Mitigation Measure 3.13-a: Implement measures to reduce ground vibration</p> <p>To reduce vibration impacts from construction activities, SMUD will require the design-build team and engineers to implement the following measures:</p> <ul style="list-style-type: none"> To the extent feasible, earthmoving and ground-impacting operations (e.g., pile drilling) will be phased so as not to occur simultaneously in areas close to sensitive receptors. The total vibration level produced could be significantly 	Prior to construction activities	During construction activities	Contractor and qualified acoustical engineer	SMUD
3.5 Cultural Resources	Impact 3.2-1: Change in the significance of a historical resource.					

¹ The evaluation of this impact included consideration of SMUD’s compliance with the construction-related noise restrictions enumerated in the City of Sacramento Noise Ordinance (Title 8, City of Sacramento Municipal Code, Chapter 8.68).

Checklist Section	Impact or Environmental Criteria	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
		<p>less when each vibration source is operated at separate times.</p> <ul style="list-style-type: none"> Where there is flexibility in the location of activating involving the use of heavy-duty construction equipment, especially auger drill rigs for installing auger cast displacement piles, the equipment will be operated as far away from vibration-sensitive receptors as reasonably possible. 				
		<p>Mitigation Measure 3.13-b: Develop and implement a vibration control plan</p> <p>A vibration control plan will be developed by SMUD's design-build team to be submitted to and approved by SMUD prior to initiating any pile drilling activities. Applicable elements of the plan will be implemented before, during, and after pile drilling activity. The plan will consider all potential vibration-inducing activities that would occur and require implementation of sufficient measures to ensure that nearby sensitive receptors, including the historic Station A building, are not exposed to vibration levels that would result in structural damage. Items that will be addressed in the plan include, but are not limited to, the following:</p> <ul style="list-style-type: none"> Identification that the maximum allowable vibration levels at nearby buildings consist of Caltrans-recommended standards with respect to the prevention of architectural building damage, specifically: 0.25 in/sec PPV for the historic Station A building. SMUD or its contractor will conduct pre-construction surveys to identify any pre-existing 	Prior to construction activities	During construction activities	Contractor and qualified acoustical engineer	SMUD

Checklist Section	Impact or Environmental Criteria	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
		structural damage to the historic Station A building. <ul style="list-style-type: none"> SMUD will identify minimum setback requirements for different types of ground vibration-producing activities (e.g., pile drilling) for the purpose of preventing damage to nearby structures and preventing negative human response will be established based on the proposed construction activities, locations, and the maximum allowable vibration levels identified above. Factors to be considered include the specific nature of the vibration producing activity, local soil conditions, and the fragility/resiliency of the nearby structures. Initial setback requirements can be breached if a project-specific, site specific analysis is conducted by a qualified geotechnical engineer or ground vibration specialist that indicates that no structural damage would occur at nearby buildings or structures. The construction contractor will monitor and document all pile drilling-generated vibration levels at the Station A building to ensure that applicable thresholds are not exceeded. The construction contractor will submit recorded vibration data on a twice-weekly basis to SMUD. If it is found at any time by the design-build team or SMUD that thresholds are exceeded, pile drilling will cease in that location and methods will be implemented to reduce vibration to below applicable thresholds, or an alternative construction method will be used at that location. 				

Checklist Section	Impact or Environmental Criteria	Mitigation Measure	Implementation Duration	Monitoring Duration	Responsibility	
					Implementation	Monitoring
3.17 Traffic and Transportation	<p>Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?</p> <p>Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</p> <p>Result in inadequate emergency access?</p>	<p>Mitigation Measure 3.17-1: Traffic Control Plan</p> <p>Prior to project construction within or adjacent to public roadways, SMUD's construction contractor shall develop a traffic control plan for the project and submit the plan to the City of Sacramento's Department of Public Works. The plan shall identify temporary lane, sidewalk, bicycle lane, and transit stop closures and provide information regarding how access and connectivity will be maintained during construction activities. The plan shall include details regarding traffic controls that would be employed, including signage, detours, and flaggers. The traffic control plan shall be implemented by the contractor during construction to allow for the safe passage of vehicles, pedestrians, and cyclists along the project route.</p>	Prior to construction	During construction activities	Contractor	SMUD

4 References

Chapter 1, Introduction

No references cited.

Chapter 2, Comments and Responses

California Department of Toxic Substances Control. 2001 (October). Information Advisory Clean Imported Fill Material Fact Sheet. Available:
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Chapter 3, Mitigation Monitoring and Reporting Program

No references cited.



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